

Honorable Marsha J. Pechman  
Honorable Theresa L. Fricke

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DEREK TUCSON, ROBIN SNYDER,  
MONSIEREE DE CASTRO, and ERIK  
MOYA-DELGADO,

Plaintiffs,

vs.

CITY OF SEATTLE, ALEXANDER  
PATTON, TRAVIS JORDAN, DYLAN  
NELSON, JOHN DOES (#1-4) AND JANE  
DOES (#1-2)

Defendants.

No. 2:23-cv-00017 MJP TLF

STIPULATED MOTION FOR RELIEF  
FROM BRIEFING DEADLINES FOR  
DEFENDANTS' MOTION TO DISMISS

NOTE ON MOTION CALENDAR: April 7,  
2023

Pursuant to Local Civil Rule 7(d)(1) and 7(j), Defendants seek the Court's leave for extensions of deadline for the opposition and reply briefs with respect to Defendants' Motion to Dismiss.

The parties have conferred and agreed to move the Court to relieve both parties of upcoming deadlines for briefing on Defendants' Motion to Dismiss as well as on Plaintiff's Motion for Preliminary Injunction. Defendants submit that there is good cause to seek a short extension of the deadlines for the Motion to Dismiss, due to scheduling difficulties. Seattle-area schools are out of

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1 session for spring break from April 10-14, and undersigned counsel has a long-planned leave  
 2 scheduled. Accordingly, the proposed extension will allow counsel additional time to ensure a  
 3 thorough, complete, and helpful response.

4 Accordingly, the parties stipulate to short reciprocal extensions: pushing the deadline for  
 5 plaintiffs' opposition to the motion from April 10, 2023 to April 13, and pushing the deadline for  
 6 Defendants' reply in support of the motion from April 13 to April 19.

7 DATED this 7th day of April, 2023.

8 I certify that this memorandum contains 124 words, in compliance with the Local Civil Rules.

<p>10 STIPULATED BY:</p> <p>11 <u>/s/ Kerala Cowart</u>          Kerala Cowart, WSBA# 53649          Jessica Leiser, WSBA# 49349          Assistant City Attorneys          E-mail: <a href="mailto:kerala.cowart@seattle.gov">kerala.cowart@seattle.gov</a>          E-mail: <a href="mailto:jessica.leiser@seattle.gov">jessica.leiser@seattle.gov</a></p> <p>14 Seattle City Attorney's Office          701 Fifth Avenue, Suite 2050          Seattle, WA 98104          Phone: (206) 733-9001</p> <p>17 <i>Attorneys for Defendant City of Seattle,          Alexander Patton, Travis Jordon, Dylan Nelson</i></p>	<p>AND BY:</p> <p>MacDONALD HOAGUE &amp; BAYLESS          705 Second Avenue, Suite 1500          Seattle, Washington 98104          Tel 206.622.1604 Fax 206.343.3961</p> <p><u>s/Braden Pence</u>          Braden Pence, WSBA #43495          Email: <a href="mailto:bradenp@mhb.com">bradenp@mhb.com</a></p> <p><u>s/Nathaniel Flack</u>          Nathaniel Flack, WSBA #58582          Email: <a href="mailto:nathanielf@mhb.com">nathanielf@mhb.com</a></p> <p>By: THE LAW OFFICE OF NEIL FOX          2125 Western Ave Ste 330          Seattle, WA 98121-3573          Tel 206.728.5440 Fax 866.422.0542</p> <p><u>s/Neil Fox</u>          Neil Fox, WSBA #15277          Email: <a href="mailto:nf@neilfoxlaw.com">nf@neilfoxlaw.com</a></p> <p><i>Attorneys for Plaintiff</i></p>
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